

**KELLEY DRYE & WARREN LLP**

NEW YORK, NY   WASHINGTON, DC   CHICAGO, IL   HOUSTON, TX  
LOS ANGELES, CA   SAN DIEGO, CA   PARSIPPANY, NJ   STAMFORD, CT

**Randall L. Morrison Jr.**  
3 World Trade Center  
175 Greenwich Street  
New York, NY 10007  
Tel: (212) 808-7544  
Fax: (212) 808-7897  
RMorrison@KelleyDrye.com

July 1, 2025

**By ECF**

The Honorable Cheryl L. Pollak, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Jeanne LaFrantz v. Diocese of Brooklyn et al.*,  
Civ. No. 21-cv-04920-NGG-CLP

Dear Judge Pollak:

We represent defendant The Roman Catholic Diocese of Brooklyn, New York (the “Brooklyn Diocese”) in the above referenced action. During the June 20, 2025 status conference, Your Honor requested the parties to submit a status report to the Court with a proposed schedule for expert discovery on July 1, 2025. To that end, we write on behalf of and with the consent of all counsel for the parties in this action to extend the discovery deadlines in this case, as proposed below, to permit the parties adequate time to complete fact discovery and set forth specific deadlines with respect to expert discovery in this case.

Discovery Deadline	Current Deadline	Proposed Deadline
End of Fact Discovery	May 30, 2025	August 1, 2025
Joint Status Report	June 6, 2025	August 7, 2025
Disclosure of Affirmative Experts	June 23, 2025	August 7, 2025
Exchange of Affirmative Expert Reports	None	September 20, 2025
Disclosure of Rebuttal Experts	August 25, 2025	October 9, 2025
Exchange of Rebuttal Expert Reports	None	November 5, 2025
Completion of Expert Depositions	None	December 8, 2025
End of Discovery	October 23, 2025	December 8, 2025
Joint Status Report	October 30, 2025	December 15, 2025
Dispositive Motions	November 24, 2025	January 8, 2026

The parties are available for a status conference at the Court's convenience, should such a conference be required. We thank the Court for its attention to this matter.

Respectfully,



Randall L. Morrison, Jr.

cc: All counsel of record (via ECF)